

### **Remarks/Arguments**

Claims 25-41 are now pending in this Application. Claims 1-24 have herein been canceled, and claims 25-41 have been added. The new claims are fully supported by the specification, and no new matter has been added to the prosecution of this application. For at least the reasons stated below, Applicants assert that all claims are in condition for allowance.

#### **1. 35 U.S.C. § 112 Rejections**

Claims 1-24 have been rejected under 35 U.S.C. § 112, second paragraph, as being indefinite. Specifically, claims 1, 9, and 17 have been rejected on the basis that the use of the word "may" includes elements not actually disclosed, and claims 2-8, 10-16, and 18-24 have been rejected based on their dependency upon claims 1, 9, and 17. In light of cancellation of claims 1-24, Applicants assert that the rejection based upon 35 U.S.C. § 112, second paragraph, is now moot. Therefore, Applicants respectfully request that the rejection be withdrawn.

#### **2. 35 U.S.C. § 103 Rejections**

Claims 1-24 are rejected under 35 U.S.C. § 103(a) as being unpatentable by Jones et al., U.S. Patent No. 6,021,397 (hereinafter "*Jones*") in view of Wren, U.S. Patent No. 6,055,514 (hereinafter "*Wren*"). Applicants oppose this rejection in light of the claim amendments above, which render rejection under *Jones* in view of *Wren* moot.

The present invention generally provides automated coaching for a financial modeling and counseling system over a network to a user, including:

- inputting personal financial data of a user;
- inputting user preferences;
- inputting user financial goals;
- inputting external financial market data;
- processing the personal financial data, the external financial market data, the user preferences, and the user financial goals; and
- outputting automated coaching advice presented in a natural language format, wherein the automated coaching advice includes:
  - a proposed product configuration formulated to comply with the user preferences and the user financial goals; and
  - a projection of an effect of the proposed product configuration on attaining the user financial goals.

*Jones* and *Wren* do not teach or suggest every element of every pending claim. At least for this reason, Applicants respectfully request that Examiner's § 103 rejections be withdrawn.

*Natural Language Format*

Applicants assert that every element of every pending claim is not taught or suggested by the references. Neither *Jones* nor *Wren* teach or suggest the presentation of coaching advice presented to the user in a natural language format. *Jones* only presents to a user numerical output derived from a user's input data. *Jones* nor *Wren* teach any presentation beyond the numeric output.

Moreover, the cited references additionally fail to teach or suggest (1) automated coaching advice in natural language format that is an interpretation of numerical data, and (2) coaching advice that includes live coaching over a network in addition to the natural language format advice. Although *Wren* discloses the ability of a user to receive "human assistance" for support in using the disclosed system, this teaching is quite distinct from receiving automated natural language format financial advice complemented by live coaching over a network as claimed. See, Col. 9, line 42-Col. 10, line 4. Because *Jones* and *Wren* do not teach these limitations, rejection under 35 U.S.C. § 103(a) is inappropriate. Applicants respectfully request withdrawal of this rejection.

*Projection of Effect of Proposed Product Configuration*

The present claimed invention further recites, "outputting automated coaching advice presented in a natural language format, wherein the automated coaching advice includes...a projection of an effect of the proposed product configuration on attaining the user financial goals." The cited references fail to teach or suggest this limitation.

The *Jones* reference discloses a financial advisory system that provides return scenarios to a user for optimizing portfolio allocations. See, col. 2, lines 48-64. Specifically, with respect to securities, the *Jones* reference merely offers suggestions including, "rebalance the portfolio" and "adjust investment risk." See col. 6, lines 17-26. However, rather than projecting the effect of a proposed product configuration vis-à-vis the user's financial goals in a natural language format, the *Jones* reference models scenarios and provides advice in a mechanical and numerical manner. See Col. 19, line 39-Col. 20, line 20; Fig. 8. *Wren* does not even remotely mention a financial projection.

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Because *Jones* and *Wren* do not teach or disclose these additional limitations, rejection under 35 U.S.C. § 103(a) is inappropriate. Applicants respectfully request withdrawal of this rejection.

### 3. Conclusion

Applicants submit that all pending claims are allowable and respectfully request that a Notice of Allowance be issued in this case. In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (612) 607-7386. If any fees are due in connection with the filing of this paper, then the Commissioner is authorized to charge such fees including fees for any extension of time, to Deposit Account No. 50-1901 (Docket 060021-376002).

Respectfully submitted,

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